

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Blue Ridge Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Norcraft Companies, LLC.  
1 Millrace Drive, Lynchburg Virginia  
Permit No.: BRRO-30845

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Norcraft Companies, LLC has applied for a Title V Operating Permit for its Lynchburg, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_  
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Date: \_\_\_\_\_

Regional Director: \_\_\_\_\_  
Robert J. Weld

Date: \_\_\_\_\_

## **FACILITY INFORMATION**

### Permittee

Norcraft Companies, LLC.  
3020 Denmark Avenue  
Eagan, MN 55121-2271

### Facility

Norcraft Companies, LLC.  
1 Millrace Drive  
Lynchburg, VA 24502

State-County-Plant Identification Number: 51-680-00153

## **SOURCE DESCRIPTION**

NAICS Code: 337110 –Norcraft Companies, LLC is a kitchen and bath wood cabinet manufacturing facility. Cabinet components are received by the source from suppliers. Minimal woodworking, consisting of routing, cutting, and sanding, is required prior to the finishing process.

The facility is a Title V major source of VOC with a Potential to Emit (PTE) of 249.0 tons/yr. The Emissions Summary for 2013 has been approved. The source emitted 213.8 tons of VOC, 12.5 tons of PM-10, 20.0 tons of xylene, 15.8 tons toluene, and 4.2 tons of ethyl benzene. This source is located in an attainment area for all pollutants, and is a PSD synthetic minor source. The facility is currently permitted under a minor NSR permit issued on 5/5/2014.

## **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## **EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emissions units, pollution control devices, and stacks are those units described in the Emission Units table of Title V permit.

## **EMISSIONS INVENTORY**

A copy of the 2013 annual emission update or permit application emission inventory is attached.

## **EMISSION UNIT APPLICABLE REQUIREMENTS**

The following section discusses requirements for the emissions units at Norcraft. These requirements come from the 5/5/2014 NSR permit, and applicable federal requirements. The language of conditions in the current Title V permit renewal is not repeated verbatim in this Statement of Basis.

## **WOODWORKING REQUIREMENTS**

### **Limitations**

The limits for the woodworking equipment at Norcraft are from the 5/5/2014 permit, and include: specification of air pollution control devices and practices, visible emission limits, and PM/PM10/PM2.5 emission limits.

### **Monitoring**

There are two types of monitoring requirements in the Title V renewal permit for woodworking: (a) those that come from the 5/5/2014 NSR permit and (b) those that are required for 40 CFR 64, Compliance Assurance Monitoring (CAM). The NSR-based requirement specifies monitoring device requirements.

The current renewal of the T5 permit does not change CAM applicability for the Norcraft facility (i.e., the woodworking baghouses are subject to CAM). The conditions that specify CAM monitoring requirements have been updated to the most recently approved boilerplate language.

Considering this monitoring and the following recordkeeping, along with the O&M requirements in the facility-wide section, the monitoring is sufficient to assure compliance with the requirements of this section.

### **Recordkeeping**

The CAM recordkeeping requirements have been updated to the most recently approved boilerplate language.

### **Testing**

None

### **Reporting**

The CAM reporting requirements have been updated to the most recently approved boilerplate language.

### **Streamlined Requirements**

None

## **FURNITURE FINISHING REQUIREMENTS**

### **Limitations**

The limits for the furniture finishing equipment at Norcraft are from the 5/5/2014 permit, and include: specification of air pollution control devices and practices, visible emission limits, and PM/PM10/PM2.5 and VOC emission limits.

### **Monitoring**

There are two types of monitoring requirements in the Title V renewal permit for furniture finishing: (a) those that come from the 5/5/2014 NSR permit and (b) those that are required for 40 CFR 70.6(a)(3), Periodic Monitoring. The NSR-based requirements specify monitoring device requirements. The Periodic Monitoring requirement specifies visible emissions observations for spray booths.

Considering this monitoring and the following recordkeeping, along with the O&M requirements in the facility-wide section, and the MACT compliance requirements, the monitoring is sufficient to assure compliance with the requirements of this section.

**Recordkeeping**

The recordkeeping for the furniture finishing equipment at Norcraft is from the 5/5/2014 permit, and includes: raw material content records for each coating, adhesive, thinner and cleaning solution, emission calculations, maintenance records, and visible emissions observation logs.

**Testing**

None

**Reporting**

None

**Streamlined Requirements**

None

**FURNITURE FINISHING MACT CONDITIONS (40 CFR SUBPART JJ)**

The 40 CFR 63 Subpart JJ applicable requirements for the furniture finishing equipment at Norcraft are from the 5/5/2014 permit, and incorporate revisions to Subpart JJ promulgated 11/21/2011 not previously included in the minor NSR permit for the facility. The applicable requirements include:

- General applicability
- Emission Standard
- Continuous Compliance
- Testing
- Submittals
- Operation & Maintenance
- Work Practice Standards
- Recordkeeping
- Notification of Compliance
- Reporting

**FACILITY WIDE REQUIREMENTS**

**Limitations**

The facility wide limitations for the Norcraft facility are from the 5/5/2014 permit, and include: maintenance, operation, and training requirements.

**Monitoring**

None

**Recordkeeping**

None

**Testing**

The facility wide testing requirement for the Norcraft facility is from the 5/5/2014 permit, and includes: provisions for emissions testing upon request.

**Reporting**

None

**Streamlined Requirements**

None

**GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

**Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§§2.2-604 and §§10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

**Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

**Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180.

**STATE ONLY APPLICABLE REQUIREMENTS**

None

**FUTURE APPLICABLE REQUIREMENTS**

None

**INAPPLICABLE REQUIREMENTS**

None were identified in the Title V permit renewal application.

**COMPLIANCE PLAN**

None

**INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

The insignificant emissions units consist of two 1 million BTU/hr natural gas driers that are described in a table in the Title V permit.

**CONFIDENTIAL INFORMATION**

None

**PUBLIC PARTICIPATION**

The proposed permit was placed on public notice in the Lynchburg News & Advance from June 27, 2014 to July 28, 2014. No comments were received from the public.